
**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In re:)	Chapter 13
)	
Pablo Fernando Sevilla,)	Bankruptcy Number 22-04870
)	
Debtor.)	Judge Timothy A. Barnes

NOTICE OF MOTION

TO: See Attached Certificate of Service

PLEASE TAKE NOTICE that on August 3, 2023, at 9:30 a.m., I will appear before the Honorable Timothy A. Barnes, or any judge sitting in that judge's place, and present the **Motion of Penelope N. Bach and Paul M. Bach to Withdraw as Counsel for Debtor**, a copy of which is attached.

All parties in interest, including the movant, may appear for the presentment of the motion either in person or electronically using Zoom for Government (audio only).

To appear by Zoom using the internet, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode

Meeting ID and passcode. The meeting ID for this hearing is 161 329 5276, and the passcode is 433658. The meeting ID and passcode can also be found on the judge's page on the court's web site

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

Ms. Penelope N. Bach
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Phone 847 564 0808

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**MOTION OF PENELOPE N. BACH AND BACH LAW OFFICES, INC. TO
WITHDRAW AS COUNSEL FOR DEBTOR**

NOW COMES Penelope N. Bach and Bach Law Offices, Inc. current attorneys of record for the Debtor in the above referenced case, and respectfully moves the Court for leave to withdrawal as attorney of record for the Defendant in the subject case and in support thereof shows unto this Court as follows:

1. Penelope N. Bach and Bach Law Offices, Inc. are attorneys of record for Pablo Fernando Sevilla in this bankruptcy case.
2. Due to irreconcilable differences Penelope N. Bach and Bach Law Offices, Inc. believe they can no longer properly represent the Debtor.
3. Therefore Penelope N. Bach and Bach Law Offices, Inc. move this court for an order allowing Penelope N. Bach and Bach Law Offices, Inc. to withdraw from this case and to fully discharge Penelope N. Bach and Bach Law Offices, Inc. of any further responsibility for the representation of the Debtor relating to this proceeding.
4. The movant is further moving for any other relief this Court deems just.

WHEREFORE Penelope N. Bach and Bach Law Offices, Inc. move the Court for leave to withdraw as attorneys of record for the Debtor in the subject case and for any further relief this court deems just.

Respectfully Submitted,

By: /s/ Penelope N. Bach
Penelope N. Bach
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